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To: Clerk of the Board - CARB  
Re: Comments regarding Agenda Item # 06-4-3

Appendix C-2, Table C-1 entitled "South Coast Air Basin Diesel PM Emissions in 2002" indicates that the health impacts of off-port trucks and locomotives are nearly twice that of ships underway, ships hotelling, cargo equipment, harbor craft, on-port trucks and locomotives, combined.

Concern for this issue is expressed in an April 2006 CARB report entitled "Evaluation of Port Trucks and Possible Mitigation Strategies." The executive summary of this report alludes to the difficulty associated with emissions reductions from off-port trucks in particular due to the fundamentally unsustainable economic reality faced by the independent truck owner/operator. The report represents the challenge as an environmental and public health dilemma and proposes a host of technical and policy solutions comprised largely of new trucks subsidized by the tax payer, bolt-on emissions reduction technologies also subsidized, and fuel additives which would increase the price of diesel fuel by 5 to 15 cents per gallon. As a technologist representing an energy technology company, the attraction to these "solutions" is well understood and appreciated.

These comments are intended to bring to the attention of CARB an additional approach to emissions reductions which my Long Beach based company, Primafuel, believes more fundamentally addresses the issues the Port community currently faces, and issues the Port has yet to address. Primafuel believes that its biodiesel product with specific NO<sub>x</sub> reducing additives can address the off-port truck PM emissions challenge in four ways:

First - With ever-rising diesel costs incurred by the independent trucker decreasing his or her real wages year-on-year, Primafuel's biodiesel product can be priced competitively, and even lower than petroleum diesel. This directly improves the economic sustainability of this critical transportation function. Additionally, Primafuel's biodiesel product can reduce wear-and-tear on truck engines, improving engine life and decreasing maintenance costs. The American Trucking Association has called for a 5% biodiesel blend standard to help stabilize diesel prices.

Second - Primafuel's biodiesel product can reduce carcinogenic PM emissions from existing trucks, without the addition of clean-up systems. With petroleum diesel price-parity, the emissions benefits of biodiesel are achieved with **zero incremental cost**. In contrast, CARB's recently published cost estimate of \$5,000 to \$37,000 to avoid one ton of PM emissions, translates to approximately 1.5 to 10 cents per gallon of diesel used. Additionally, it has been documented that biodiesel can improve the performance of clean-up systems, further illustrating the synergy between biodiesel and more conventional approaches to emissions reduction.

Third - Biodiesel is non-toxic, making biodiesel/petroleum diesel blends less toxic than conventional petroleum diesel. Less toxic fuels improve air quality, and water quality from spillage.

Fourth - California is preparing join the rest of the world in an effort to combat climate change. Biodiesel is one of the most cost-effective ways to reduce net CO<sub>2</sub> emissions. The Ports of LA and Long Beach are major consumers of fossil fuels, and therefore, a major emitter of CO<sub>2</sub>. With CO<sub>2</sub> emissions regulation beginning in 2009, now is the time to develop a comprehensive CO<sub>2</sub> reduction road-map to meet these new regulations.

With a call for California to decrease our fossil fuel consumption, a renewed national call for energy independence and a geopolitical reality that demands reduced consumption, the use of biodiesel has broad support from a wide range of stakeholders. The ILWU, all five branches of the US Armed Forces, the American Lung Association, the Federal Government, and climate change activists actively support the use of biodiesel. Primafuel intends to meet this growing demand, and we look forward to working with the community, businesses, and relevant regulatory agencies to address the challenges associated with the use of fossil fuels.